

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

ANNE SMITHERS, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 1:18cv676 (TSE/IDD)
)	
FRONTIER AIRLINES, INC.)	
)	
Defendant.)	
)	

CONSENT MOTION FOR ENTRY OF PROTECTIVE ORDER

COME NOW the Plaintiffs Anne Smithers and Henry Wiley (collectively, “Plaintiffs”), and Defendant Frontier Airlines, Inc. (“Defendant”) (collectively, the “Parties”), in the above-styled matter, and hereby move this Court for entry of the Stipulated Protective Order (“Protective Order”) submitted herewith. The Parties agree to the entry of the Protective Order and **to waiver of a hearing on this Consent Motion.** The Protective Order is necessary to ensure the confidentiality of confidential, proprietary, and/or trade secret information that may be disclosed during the course of discovery in this matter.

WHEREFORE, for good cause shown, the Parties respectfully request that this Court grant this Consent Motion.

Respectfully submitted this 13th day of March, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of March, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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